

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

ANTHONY PAUWELS, Individually and On  
Behalf of All Others Similarly Situated,

Plaintiff,

v.

BIT DIGITAL, INC., MIN HU, and ERKE  
HUANG,

Defendants.

Case No. 1:21-cv-00515-ALC

CLASS ACTION

ZHONGXUN YANG, Individually and On  
Behalf of All Others Similarly Situated,

Plaintiff,

v.

BIT DIGITAL, INC., MIN HU, and ERKE  
HUANG,

Defendants.

Case No. 1:21-cv-00721-ALC

CLASS ACTION

JOSEPH FRANKLIN MONKAM NITCHEU,  
individually and on behalf of all others similarly  
situated,

Plaintiff,

v.

BIT DIGITAL, INC., MIN HU, and ERKE  
HUANG,

Defendants.

Case No. 1:21-cv-02262-ALC

CLASS ACTION

**NOTICE OF MOTION OF JOSEPH FRANKLIN MONKAM NITCHEU FOR  
CONSOLIDATION, APPOINTMENT AS LEAD PLAINTIFF, AND  
APPROVAL OF SELECTION OF LEAD COUNSEL**

PLEASE TAKE NOTICE that on a date and time that may be set by the Court, before the Honorable Andrew L. Carter, Jr., at the United States District Court for the Southern District of New York, located at the Thurgood Marshall United States Courthouse, Courtroom 1306, 40 Foley Square, New York, New York 10007, Joseph Franklin Monkam Nitcheu will respectfully move this Court for entry of an Order, pursuant to Section 21D(a)(3)(B) of the Securities Exchange Act of 1934, 15 U.S.C. § 78u-4(a)(3)(B), as amended by the Private Securities Litigation Reform Act of 1995 (the “PSLRA”): (1) consolidating the above-captioned actions; (2) appointing Mr. Nitcheu as Lead Plaintiff; (3) approving of his selection of Block & Leviton LLP as Lead Counsel for the class; and (4) for any further relief which the Court may deem just and proper.

This Motion is made on the grounds that Mr. Nitcheu believes that he is “the most adequate plaintiff” under the PSLRA and should, therefore, be appointed Lead Plaintiff. Specifically, Mr. Nitcheu believes that he has the largest financial interest in the relief sought by the Class in this action by virtue of, among other things, the significant losses he incurred on his class period transactions in Bit Digital, Inc. securities. Furthermore, Mr. Nitcheu satisfies the requirements of Rule 23 of the Federal Rules of Civil Procedure because his claims are typical of other Class members’ claims and because he will fairly and adequately represent the interests of the Class.

This Motion is based upon the accompanying Memorandum of Law in support thereof, the Declaration of Jeffrey C. Block filed herewith, Mr. Nitcheu’s Certification and Declaration filed herewith, the pleadings and other filings herein, and such other written or oral argument as may be permitted by the Court.

WHEREFORE, Mr. Nitcheu respectfully requests that the Court: (1) consolidate the other related securities fraud class action lawsuits against Bit Digital, Inc. filed in this district; (2) appoint Mr. Nitcheu as Lead Plaintiff pursuant to the PSLRA; (3) approve of Mr. Nitcheu’s selection of

Block & Leviton LLP as Lead Counsel for the Class; and (4) grant any such further relief as the Court may deem just and proper.

Dated: March 22, 2021

Respectfully submitted,

/s/ Jeffrey C. Block

Jeffrey C. Block

Stephen J. Teti

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*Attorneys for Mr. Nitcheu and*

*Proposed Lead Counsel*

**CERTIFICATE OF SERVICE**

I hereby certify that on March 22, 2021, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send a Notice of Electronic Filing to all counsel of record.

/s/ Jeffrey C. Block  
Jeffrey C. Block